

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Rodriguez, et al. v. Islamic Republic of Iran</i>	18-cv-12347 (GBD)(SN) ECF Case

**RODRIGUEZ I PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF FINAL
DEFAULT JUDGMENTS AGAINST ISLAMIC REPUBLIC OF IRAN AS TO
LIABILITY AND DAMAGES**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Austin Estelle (“Estelle Declaration”), with exhibits and the accompanying memorandum of law, the *Rodriguez* Plaintiffs identified in Exhibit A to the Estelle Declaration respectfully move this Court for an Order of judgment by default as to liability against the Islamic Republic of Iran (“Iran”) as to all claims under 28 U.S.C. § 1605A(c).

Furthermore, those *Rodriguez* Plaintiffs identified on Exhibit A to the Estelle Declaration respectfully move this Court for an Order awarding them (1) solatium and pain and suffering damages for the losses they suffered as the immediate family members (in this instance, spouses, parents, children, and siblings, or the estate of a spouse, parent, child, or sibling) of their decedents (as indicated in Exhibit A to the Estelle Declaration) in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and (3) permission for the *Rodriguez* Plaintiffs identified in Exhibit A to seek punitive damages, economic damages, or other damages at a later date, and for all other *Rodriguez* Plaintiffs not appearing on Exhibit A to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Dated: July, 2022

Respectfully,

/s/ Austin Estelle

Austin Estelle, Esq.

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